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November 2, 2020

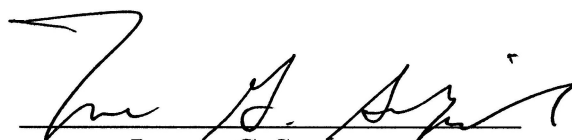
VIA ECF

Honorable Lorna G. Schofield
United District Judge
United States Courthouse
40 Foley Square
New York, N.Y. 10007

Application Granted in part. Defendants' motion(s), if any, shall be filed by **December 2, 2020**. The Government's response shall be filed by **December 16, 2020**. Defendants' reply shall be filed by **December 23, 2020**. All other dates shall remain unchanged. The Clerk of the Court is directed to terminate the letter motions at docket numbers 39 and 40.

Dated: November 6, 2020
New York, New York

Re: United States v. Jason Pichardo, et ano.
20 Cr. 369 (LGS)



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

Motions in the above captioned case are currently scheduled to be filed on November 6, 2020. I write this letter to respectfully request an additional thirty days to file said motions.

As previously mentioned, the discovery in this case is quite voluminous. The assigned assistant and I are engaged in active plea negotiations, and I anticipate receiving a proposed plea agreement shortly. I have also contacted the Essex County Correctional Facility in Newark, New Jersey, where Mr. Pichardo is housed, for a video conference. I requested today or tomorrow for the conference, but am still waiting to hear back from the facility as to the date. Once I meet with Mr. Picardo and review the latest round of discovery, I will know whether we have a disposition or need to file the motions.

I have also I have spoken to the assigned assistant, Peter Davis, and he consents to this request. I am informed co-counsel has made the same request of this Court. We also consent to the exclusion of speedy trial time for the above stated reasons.

It is therefore respectfully requested that the defense be granted an additional thirty days to file motions if we cannot reach a disposition in this matter.

Respectfully submitted,

_____/s/_____
Barry A. Weinstein, Esq.

cc: A.U.S.A. Peter Davis